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George Suarez

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, }  
vs. } Plaintiff, } Case no. 18-cr-00390-RFB-BNW-5  
GEORGE SUAREZ, } Defendant. } STIPULATION TO CONTINUE  
} SENTENCING  
} (Third Request)<sup>1</sup>

IT IS HEREBY STIPULATED AND AGREED, by and between United States of America, by and through Nicholas A. TRUTANICH, United States Attorney, and Allison Reese, Assistant United States Attorney, and Patricia M. Erickson, counsel for defendant George Suarez that the sentencing hearing currently scheduled for December 20, 2019 at 10:00 A.M. be vacated and set to a date and time convenient to this Honorable Court during the month of January, 2020.

This stipulation is entered into for the following reasons:

1. A significant breakdown in communication has occurred between Mr. Suarez and his retained counsel, Vitaly B. Sigal.

III

III

<sup>1</sup> On December 5, 2019, the sentencing was continued to December 19, 2019. Subsequently, at the request of the parties, the sentencing hearing was continued by one day to December 20, 2019. Consequently, this motion requests a third continuance of the sentencing date.

- 1           2. Based on this breakdown in communication, Mr. Suarez has  
2           requested Patricia M. Erickson become his primary retained counsel  
3           and appear with him on the sentencing date.<sup>2</sup>  
4           3. Ms. Erickson will be out of the jurisdiction between December 18 and  
5           December 22, 2019.  
6           4. Given the fact that Mr. Suarez believed he would be sentenced on  
7           December 5, 2019, he made plans to be with his family members  
8           during the upcoming holidays.  
9           5. The parties agree to the requested continuance.  
10          6. Additionally, denial of this request for continuance could result in a  
11           miscarriage of justice.  
12          7. The additional time requested by this Stipulation is made in good faith  
13           and not for purposes of delay.

14 This is the first written request for a continuance but the third request based upon  
15 proceedings in court.

16           Dated this 9<sup>th</sup> day of December, 2019.

17 NICHOLAS TRUTANICH  
18 UNITED STATES ATTORNEY

19           \_\_\_\_\_  
20 /s/ Allison Reese  
21 Allison Reese  
22 Assistant U.S. Attorney

23           \_\_\_\_\_  
24 /s/ Patricia M. Erickson  
25 Patricia M. Erickson  
26 Counsel for Defendant George Suarez

27           \_\_\_\_\_  
28           <sup>2</sup> While Patricia M. Erickson is already listed as counsel in the case at  
bar, out of an abundance of caution, she is simultaneously efilng the Designation of  
Retained Counsel.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
GEORGE SUAREZ,  
Defendant.

Case no.18-cr-00390-RFB-BNW-5

## ORDER

Based on the Stipulation of the parties, this Court finds that the ends of justice are served by granting the requested continuance which outweighs the best interest of the public and the Defendant in a speedy sentencing since failure to grant the continuance would be likely to result in a miscarriage of justice and would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for the sentencing, taking into account the exercise of due diligence.

IT IS THEREFORE ORDERED that the sentencing in the above-captioned matter currently scheduled for December 20, 2019 at 10:00 AM be vacated and continued to Wednesday, January 8, 2020 at 2:15 p.m.

Dated this 10th day of December , 2019

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RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE